

REED SMITH LLP  
A limited liability partnership formed in the State of Delaware

J. David Bickham (SBN 145449)  
Email: dbickham@reedsmith.com  
Alicia A. Adornato (SBN 254228)  
Email: aadornato@reedsmith.com  
John D. Pingel (SBN 267310)  
Email: jpingel@reedsmith.com  
REED SMITH LLP  
101 Second Street, Suite 1800  
San Francisco, CA 94105-3659  
Telephone: +1 415 543 8700  
Facsimile: +1 415 391 8269

Attorneys for Plaintiff  
MICHAEL ANTHONY SAAVEDRA

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

MICHAEL ANTHONY SAAVEDRA,  
Plaintiff,  
vs.  
A. HEDGPETH, et al.,  
Defendants..

Case No. C-09-0178 CRB (PR)

**PARTIES' STIPULATION AND  
~~PROPOSED~~ ORDER TO CONTINUE  
TELEPHONIC STATUS CONFERENCE**

Currently Scheduled Telephonic Status  
Conference:

Date: December 4, 2012  
Time: 1:00 p.m.  
Dial-in: 888-864-8852

Complaint Filed: January 14, 2009

Honorable Nandor J. Vadas

Plaintiff Michael Anthony Saavedra ("Plaintiff") and Defendants Anthony Hedgpeth, et al. ("Defendants") (collectively, "the parties") hereby submit this Stipulation and [Proposed] Order to Continue the telephonic status conference currently scheduled for December 4, 2012.

### STIPULATION

WHEREAS, on October 17, 2012, the Parties conducted a Settlement Conference before Magistrate Judge Vadas, at which the Parties reached a tentative settlement of this lawsuit;

WHEREAS, counsel for the Parties have worked since the Settlement Conference to reach final terms for the settlement agreement, but have not yet agreed on final terms;

WHEREAS, Plaintiff's counsel's offices are in San Francisco, California, and Plaintiff is incarcerated in the Segregated Housing Unit at Corcoran State Prison, a round trip distance of approximately 500-miles;

WHEREAS, Plaintiff's counsel's communication with Plaintiff for the purpose of discussing and approving settlement terms has been limited to US mail, which is delayed by the prison security screening system;

WHEREAS, the Parties agree that the December 4, 2012 Case Management Conference should be continued in the interests of judicial economy due to the near final resolution of this matter;

IT IS HEREBY STIPULATED, by and between the parties that the December 4, 2012 telephonic status conference should be continued due to the pending settlement discussions until December 18, 2012.

DATED: November 29, 2012

BY: /s/ Alicia Adornato

Alicia A. Adornato

Reed Smith LLP

*Pro Bono Attorneys for Plaintiff Michael  
Anthony Saavedra*

DATED: November 29, 2012

BY: /s/Michael Quinn

Michael J. Quinn

Deputy Attorney General

(as authorized on November 29, 2012)

*Attorneys for Defendants Valdez, Martinez,  
Hughes, and Hedgpeth*

## ORDER

Because of the continuing settlement discussions, the December 4, 2012 telephonic status conference should be continued due to the pending settlement discussions until December 18, 2012 at 1:00 pm. The parties shall use the same dial-in information for the continued telephonic status conference.

**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

Dated: November 30, 2012

Nandor J. Vadas  
United States Magistrate Judge

